



Handwritten initials/signature

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8593

UNITED STATES OF AMERICA
Plaintiff,

v.

Angelica VOLQUARSEN,

Defendant

) Magistrate Case No.:
)
) COMPLAINT FOR VIOLATION OF
)
) 21 U.S.C. § 952 and 960
) Importation of a Controlled
) Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about June 30, 2008 within the Southern District of California, defendant Angelica VOLQUARSEN, did knowingly and intentionally import approximately 38.54 kilograms (84.78 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Signature of Enrique Torregrosa
Enrique Torregrosa Special Agent
U. S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 1st DAY
OF JULY 2008.

Signature of Peter C. Lewis
PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA
2 v.
3 Angelica VOLQUARDSEN

4 STATEMENT OF FACTS

5 This complaint is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special
7 Agent Enrique Torregrosa.

8 On June 30, 2008, at approximately 1107 hours, Angelica
9 VOLQUARDSEN entered the United States from the Republic of Mexico
10 via the Calexico, California, West Port of Entry. VOLQUARDSEN was
11 the driver and registered owner of a 2000 Ford F-150 truck, bearing
12 California U. S. license plate 6E50583.

13 Customs and Border Protection Officer (CBPO) L. Garcia
14 obtained a negative Customs declaration from VOLQUARDSEN and asked
15 her about the vehicle she was driving. VOLQUARDSEN stated that it
16 was her vehicle and handed the documents to CBPO Garcia. CBPO
17 Garcia noticed that VOLQUARDSEN was nervous; her nervous demeanor
18 included trembling of hands. CBPO Garcia referred VOLQUARDSEN and
19 her truck to the vehicle secondary lot for further inspection.

20 Upon arrival to the vehicle secondary lot, CBPO F. Lopez
21 obtained negative Customs declaration from VOLQUARDSEN and asked
22 her where she was going and about the ownership of the truck.
23 VOLQUARDSEN stated she was going to Calexico, California and she
24 stated she owned the vehicle for about six months. CBPO Lopez also
25 noticed that VOLQUARDSEN was nervous; her nervous demeanor included
26 no eye contact and trembling of hands. CBP Canine Officer Randolph
27 screened the truck utilizing his assigned Human/Narcotic Detector
28 Dog (HNDD) and the HNDD alerted to the truck. CBPO Rivera escorted
VOLQUARDSEN to the vehicle secondary office for a further

1 inspection.

2 A subsequent search of the truck by CBPO Lopez revealed
3 several packages hidden within a specially built compartment
4 located within the dash of the truck. CBPO removed sixteen (16)
5 packages concealed within the dashboard and two (2) packages
6 concealed behind the tool box. The approximate weight of the
7 packages was 38.54 kilograms (84.78 pounds). CBPO Lopez probed one
8 package, which produced a green leafy substance, which field-tested
9 positive for marijuana.

10 Special Agent Torregrosa read the Miranda Rights to
11 VOLQUARSEN which she understood and waived agreeing to answer
12 questions. VOLQUARSEN stated that her husband "EDWARD CERDA"
13 offered her \$2,000.00 to smuggle marijuana into the United States.
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